



# Fund prospectus 2022

Fondita Fund Management Company Ltd.

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## General information

### Fondita Fund Management Company

Fondita Fund Management Company Ltd. (hereinafter "Fondita") is a company that concentrates on actively managed equity funds. Fondita started fund activities on 7 April 1997. Our investment philosophy is based on stock picking and concentrated portfolios. In our investment process, we concentrate on companies with strong market positions, good prospects and a sustainable focus.

Visiting address:

Fondita Fund Management Company Ltd.  
Aleksanterinkatu 48 A  
00100 Helsinki  
Finland

### Board

Chairman of the Board

Magnus von Knorring, M.Sc. (Econ.)

Members

Fredrik von Knorring, M.Sc. (Econ.)

Gunvor Kronman, M.Sc. (Arts)

Markus Larsson, M.Sc. (Econ.)

Timo Luukkainen, MBA, B. Sc. (Econ), M. Sc. (Eng.)

Patrik Tigerschiöld, M.Sc. (Econ.)

### Executive management

Markus Larsson, CEO

Fredrik von Knorring, deputy CEO

### Audit and supervision

Fondita and Fondita's funds are audited by Ernst & Young Oy. The responsible auditors are Anders Svennas, CPA and Robert Söderlund, CPA.

Fondita is supervised by the Finnish Financial Supervisory Authority.

### Depository

Fondita uses Skandinaviska Enskilda Banken AB (publ) Helsinki branch as depository (FO number 0985469-4, address Eteläesplanadi 18, 00130 Helsinki). The main activity of the Helsinki branch of Skandinaviska Enskilda Banken AB is banking. Skandinaviska Enskilda Banken AB (Company registration number 502032-9081) has its registered office in Stockholm, Sweden (Kungsträdgårdsgatan 8, 111 47 Stockholm). The task of the depository is to ensure that Fondita and its funds comply with the law, the fund's rules and the regulations of the authorities in their activities.

If necessary, the depository may appoint one or more sub-custodians. The depository shall use its best endeavours to segregate the assets of the fund from the assets of the custody or of the sub-custody in the event of bankruptcy. Where necessary, Fondita will provide information on the sub-custodians used.

### Fund units and dividends

Fund units are divided into return units and growth units. The Annual General Meeting of the fund company decides on the annual return of the units. The return on growth units is realised in full upon redemption of the fund units.

## Subscription of fund unit

Fondita accepts fund unit subscriptions mainly every banking day (in the fund rules "valuation day"). The subscription day is the valuation day on which the subscription amount is at the disposal of the fund company's appropriate bank account, no later than 13:30 CET. Subscriptions are made by depositing the amount you wish to invest into the bank account of the fund company according to the investment fund of choice. At the time of payment, the name of the subscriber and his/her personal ID number/date of birth are entered in the message field. The fund company is obliged to identify its clients in accordance with the provisions of the Finnish anti-money laundering act. A prerequisite for becoming a client is that the client information form has been completed and that the fund company has been able to verify the identity of the client. The fund company has the right to reject the subscription if the client cannot be reliably identified or if additional investigation reveals something giving a cause for rejection. The number of units subscribed is calculated to four decimal places by dividing the subscription amount by the value of one unit.

## Redemption (of fund units)

The fund company should be notified in writing of the redemption of fund units and any unit certificates should be sent to the fund company. Please note that a prerequisite for the fund company to approve a fund order is that the client has provided the fund company with the information requested in the client information form. Redemption generally takes place at the unit value calculated by the fund company for the same banking day if the order has been received by Fondita no later than 13:30 CET \*. The redemption amount is paid to the account indicated by the client on the client information form, normally one business day after the order is executed, provided that the fund has sufficient liquidity. A redemption confirmation note is sent to the customer.

\*Additional information on redemption restrictions can be found in section 8 of the fund rules.

## Fees

Fees and other costs, are charged according to the price list on page 22.

## Rebates

Total client relationship allow for changes in tariff rates.

## External services

In carrying out investment fund activities, the fund company may use external services such as accounting and data processing services, distribution services and for the receipt of subscription and redemption orders. Fondita has partially outsourced the maintenance of the unit holder register to the following partners: Nordea Bank, Nordnet Bank and United Bankers. Capatico GmbH acts as Fondita's agent in Germany, RIC Consulting acts as Fondita's agent in Germany Austria. In Sweden, Fondita has a collaboration with Atle Investment Services AB.

The marketing of the funds is managed by Atle Investment Services AB in Sweden Capatico GmbH in Germany and RIC Consulting in Austria along with Fondita.

## Ownership policies

The Board of directors at Fondita has established principles of corporate governance. Fondita is responsible for ensuring that the interests of the funds and unitholders are protected in the best possible way. This means efforts to increase the value of the fund, taking into account the fund's investment strategy and level of risk. Even though the funds managed by Fondita always are minority owners, Fondita can through corporate governance affect the decisions made in the company. Fondita presumes that the companies follow good governance and management principles. Fondita endeavours to participate in general meetings where the interests of fund unitholders need to be protected. If necessary, Fondita can also vote by proxy. Fondita is responsible for ensuring that voting rights are used in accordance with the purpose and strategy of the investment in the company in question. The principles are available in full on the Fondita's website.

## Remuneration policy

Fondita's remuneration policies apply to the following groups of staff: executive management, fund managers and members of the company's permanent risk control function. When remunerating employees, Fondita follows the provisions on remuneration in Chapter 4b of the Finnish Investment Funds Act. Employees do not receive variable remuneration, as the entire salary consists of a fixed monthly or hourly wage. Fondita's remuneration principles are not linked to sustainability targets or sustainability risks.

## Error list

The fund company maintains an error list in accordance with the instructions of the Finnish Financial Supervisory Authority. The error list shows the errors made in valuations and the reasons behind them. The threshold for what the Finnish Financial Supervisory Authority refers to as significant errors is 0,5%.

## Reporting

Fondita's online service is available to direct Fondita clients. The service grants access to your fund holdings report and other information about your investments. In addition to the online service, Fondita sends fund holdings reports and monthly fund reports to clients by e-mail once a month or once a year by mail (31 December).

## Right of withdrawal

According to Finnish law, an investor cannot withdraw a placed fund order.

## Publication of fund unit value

The unit value is published on our web site by 16.00 CET the banking day following the valuation day. You can also track the unit value of the fund via Morningstar and other data providers' websites.

## Other information

The Fund Management Company was registered on 31 January 1992 and Fondita started fund activities on 7 April 1997. Fondita's share capital is EUR 227,640.00.

## Risk information associated with funds

Fondita applies risk management principles approved by the Board of Directors of the Fund Management Company. These principles describe the procedures for the continuous monitoring and management of risks in the funds and Fund Management Company. Fondita has organised its risk management with a risk management function whose task is to monitor and manage risks that come to light.

Risk refers to the uncertainty associated with the outcome of the investment return. This risk may mean that the return on the investment may be worse or better than expected. The information presented below is not exhaustive, but it includes typical risks associated with equity funds.

### Information on risks associated with equity funds

Risks associated with funds in general are described below. Fund-specific risks can be found in each fund's Key Investor Information Document (KIID).

**Equity risk** Equity risk is the risk associated with funds investing in shares where the value of the fund is affected by the market price of the shares in which the fund is invested. Sharp changes in the prices of individual shares may occur.

**Sector risk** There is a sector risk with funds which, according to their rules, only invest in a specific sector. This means that the fund cannot reallocate its resources to other sectors if, for example, something happens to negatively affect the fund's sector. The performance of investments in an individual sector may differ significantly from the general performance of the stock market.

**Force Majeure risk** Force Majeure risk refers to unforeseeable, unavoidable events that affect the entire business and that are not the fault of the Fund Management Company or its counterparties. These may include natural

disasters, general strikes, mobilisations, coups d'état, wars or other armed conflicts. If such an event occurs, it may have a significant impact on the market price of investments and the viability of fund activity, as well as on the continuity of the entire business.

**Sustainability risks** Sustainability risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment.

**Liquidity risk** Liquidity risk refers to the risk that the fund may not be able to convert the invested funds into cash at a reasonable price during the normal trading cycle. Liquidity risk is greater, for example, with the securities of smaller companies, whose turnover is generally smaller than that of large companies. Lower turnover may affect the value of the investment and delay pay-outs.

**Market risk** Market risk refers to risks generally associated with the development of investments, regardless of currency or sector, for example.

**Market area risk and political risk** There is a market area risk for funds which, according to their rules, only invest in a specific geographical area. This means that the fund cannot reallocate its resources to other geographical areas if, for example, something happens to negatively affect the fund's geographical market. Market area risk may be associated with political risk, i.e. political decisions affecting fiscal policy, currency or the political environment, which in turn may affect the market price of the fund's investments. Political risks may also arise in the form of difficulties in transferring means out of a specific country.

**Counterparty and custody risk** Counterparty risk refers to situations where a party does not act as agreed, for example in terms of delivery within an agreed time. Custody risk is the risk that the custodian or sub-custodian of the fund's securities may not comply with the agreements or contracts entered into or other events that prevent the realisation of the securities held in accordance with normal procedures.

**Operational risk** Operational risk refers to the risk of loss that can occur in a fund. Operational risks can arise if there are shortcomings in, for example, personnel, data systems, data protection, the organisation or partners. External cyber attacks or major problems in the banking system may affect trading.

**Strategy risk** Strategy risk or style risk means that the fund's investment strategy has an effect on the fund's performance. For example, the performance of a fund that invests only in growth companies or small companies may deviate significantly from the general market trend. An active and proactive management strategy can have a significant impact on the value of the fund. A concentrated portfolio means that successful or unsuccessful stock selection can have a significant impact.

**Currency risk** There is a currency risk when investments are made in currencies other than EUR. Situations may arise where the currency fluctuates sharply against EUR, and this in turn will either reduce or increase the value of the investment.

## Fondita's responsible investments

### Consideration of sustainability risks and negative impacts

#### Integration of ESG risks in the investment decisions

ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. In order for us to be aware of these risks in our funds, we include this aspect in our investment decisions.

Fondita avoids sectors that we believe are associated with high risk from an ESG perspective. There is a high risk of increased regulation, taxation and political opposition in these activities. Public opinion also tends to become more negative towards these activities. All this makes companies in these sectors operate in an uncertain and unfavourable environment. In addition, these activities can easily be considered questionable from an ethical perspective. The sectors in which we do not invest are fossil fuel, tobacco, cannabis, alcohol, weapons, adult entertainment, nuclear power plants, uranium, GMO (red), gambling and quick loans. The exclusion applies to companies that are directly active in these sectors (>5% of turnover) or that are suppliers to these sectors (>5% of turnover). We also avoid companies that have violated the UN Global Compact 10 principles.

#### Principal Adverse Sustainability Impacts

Fondita take into consideration the investment decisions principal adverse sustainability impacts. Before making an investment, we evaluate the ESG risks associated with the company. If we perceive the risk to be higher, it affects our return requirement on the company. This evaluation is done based on the ESG risk metrics from our databases. Our own evaluation also influences the decision. This evaluation is based on the company's history, the industry, third-party analysis, and our dialogue with the company. We form an overall picture of the company from an ESG risk perspective. In our small- and micro-cap funds we do not have access to the same amount of data from the databases, so in these cases we form an overall picture mainly on the basis of a dialogue with management, and through our own ESG analysis.

In order to assess the potential principle adverse sustainability impacts on an investment, we pay close attention to the sector to which the holding belongs, the geographical location of production, and what the company produces. Certain sectors and geographies are simply associated with a higher risk of ESG-related incidents. We also take into account a number of qualitative and quantitative indicators of the company's management and their prioritisation of ESG. In addition, we monitor the company's data points regarding CO2 emissions and its ambitions to reduce them. We also clarify management's approach to ESG in the company in general during meetings with them.

#### Responsible investment principles

The goal of our investment business is to generate the best possible return for our customers. We aim to do this responsibly and in accordance with the chosen investment strategy.

Our principles for responsible investment are based on the belief that companies that act responsibly and work in accordance with sustainable principles are better investments in the long term, as the risks and opportunities related to the environment, society and governance (ESG factors) are more extensively explored. Therefore, it is important to integrate ESG-related factors when performing a company analysis.

We strive to always act responsibly and in accordance with sustainable development in our investment decisions and in our own daily operations. Responsibility is grounded in our employees' values. In our principles for responsible investment, in our sustainability risk assessments and in our operations, we take into account the most common international agreements and standards that guide society and business.

## The goal of responsible investing

We want to own shares in companies where sustainability and ESG factors are integral to a company's strategy and corporate culture. This means the company acts responsibly towards its employees and treats everyone equally, while monitoring, measuring and improving its own environmental footprint. The company's sales come mainly from business operations that we believe are sustainable in the long term, and the end product or service is in line with the overall values of sustainable development. We take our climate responsibility seriously and work to reduce our carbon footprint towards eventual carbon neutrality.

All Fondita funds – both small cap and thematic funds – are actively managed funds based on bottom-up stock picking. They have a consistent investment philosophy and follow the same strategy for responsible investing. Our goal is to be long-term owners in responsible, high-quality growth companies, and our strong thematic drivers are environmental- and climatesmart solutions, health and well-being, and digitalization and technological development.

## Our method for responsible investing

Responsible investing includes a number of methods at different stages of the investment process in order to integrate ESG factors into portfolio management. For Fondita, these methods are:

- Negative screening - exclusion/norm-based screening
- Positive screening - thematic drivers
- Integration of ESG factors into investment analysis
- Active ownership
- Advocate for sustainable development and responsible investment

Through negative screening we exclude from our investment universe certain sectors that we have identified as unsustainable, either because of their climate impact or their broader societal impact. Companies whose operations violate general standards do not belong in our investment funds either.

The purpose of positive screening is to identify companies where a significant part of turnover comes from activities, we consider to be sustainable over time in terms of both the environment and social responsibility. We aim to find companies with good sustainability ratings and low ESG risk. With positive screening, we can improve the responsibility profiles of our funds by prioritising companies with, for example, stronger environmental profiles, better working conditions or a proactive equality strategy. We can also use this to help us find companies that benefit from megatrends that are important to us. Positive screening is a good tool for our thematic funds in particular.

Considering and integrating ESG factors into the analysis of a company is key to responsible investment. This means that ESG factors are integrated into the overall analysis alongside economic analysis of the fundamentals. We use our own internal company-specific analysis tools, as well as ESG analysis from partners and ESG tools and databases from MSCI and Morningstar.

When carrying out our own ESG inquiries with our portfolio companies, we go into detail on various parameters that affect environmental, social and governance aspects. We pay special attention to the following factors:

### Environment

- Use of renewable energy
- CO2 emissions (scope 1 & 2)
- Carbon dioxide risk
- Energy consumption
- Water use
- Waste management
- Taxonomy

## Social

- Gender equality and diversity
- Safety
- Health
- Corporate culture
- Measures to prevent human rights violations

## Governance

- Measures to combat corruption and bribery
- Board independence
- Remuneration policy
- The relationship between ESG factors and remuneration
- The company's risk management

Before we make an investment decision, we strive to discuss with the company's management to ensure that our view of the company and its strategy is in line with the management's vision. We are also active owners during the investment period itself, closely monitoring the company's operations and meeting with company representatives each year. During these meetings we discuss issues that affect operational activities and the business environment, and whenever possible, we strive to encourage responsible and sustainable operations, as well as transparency in reporting.

These meetings also give us the opportunity to raise issues that are important to us. From 2022 onwards, we will identify at least two important sustainability issues that we will consistently discuss with the companies' management. In 2022, we will focus on: 1) the company's strategy for achieving carbon neutrality; and 2) the company's actions for achieving equality and diversity.

Our principles for responsible investing and corporate governance are aimed at achieving a long-term increase in the value of the companies held. Fondita assumes that the companies follow good corporate governance and management principles, for example by following the Finnish Securities Market Association's Code of Corporate Governance. In addition, emphasis is placed on environmental and social responsibility. If it is considered that any of the companies' corporate governance is not adequate, Fondita will try to influence the company and/or its leaders to bring about change. In such cases, cooperation with other shareholders may also occur. Fondita may also conclude that it is better for the shareholders to withdraw the holding than to affect the company's proceedings. Fondita strives to participate in the general meetings of companies where the interests of our fund unit holders need to be protected. If necessary, Fondita can also vote with the help of a proxy. Fondita is responsible for ensuring that voting rights are applied in accordance with the purpose and strategy of the investment in the company in question. Each fund votes individually at the Annual General Meeting (AGM).

## Sustainable Finance Disclosures Regulation (SFDR)

### **SFDR classification: Article 8**

**Applies to the following funds: Fondita European Micro Cap, Fondita European Small Cap, Fondita Finland Micro Cap, Fondita Global Megatrends, Fondita Healthcare, Fondita Nordic Micro Cap and Fondita Nordic Small Cap**

The funds promote, among other things, environmental and social aspects. As part of the funds' investment process, ESG issues are taken into account in investment decisions. Fondita applies a number of different methods, which are described in detail under the heading "Our method for responsible investing" on page 8. Investment decisions take into account environmental and social issues and the risks associated with them. The funds invest in companies that follow good governance practices. ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. As part of the ESG analysis of an investment object, the manager, together with the ESG team, identifies each investment object's sustainability risks, the likelihood of these risks materialising and the magnitude of the impact. All potential investment targets are subject to both an ESG analysis and a business analysis. We continuously assess the holders' sustainability risks, their likelihood and magnitude as part of our investment process. Any sustainability risks that materialise may have a negative impact on the holding and therefore the fund's returns. We continuously monitor these risks and, based on our assessment, this may have an impact on our investment decisions. We believe that one of the main sustainability risks that may affect the value of the funds' investments is related to environmental and climate issues. We manage these risks by excluding certain controversial sectors and conducting a thorough sustainability risk assessment of the sectors in which we invest. ESG analysis of the companies is performed jointly by the ESG team and the fund managers. The funds do not have an official benchmark.

### **Information on the EU taxonomy for environmentally sustainable activities**

The EU taxonomy is a classification system that aims to establish common criteria for environmentally sustainable economic activities. The regulatory framework requires each fund to disclose the proportion of its investments that comply with the taxonomy. Although the funds promote environmental aspects, the funds are not committed to making sustainable investments or investments in environmentally sustainable activities that meet the requirements of the EU Taxonomy Regulation and therefore the funds do not have a target of a certain proportion of their investments being sustainable investments.

The framework includes a "do no significant harm" principle, which means that investments that contribute to one sustainability objective must not at the same time cause significant harm in the context of any other sustainability objective. The "do no significant harm" principle only applies to the parts of the fund that consist of investments that either qualify as sustainable under the Sustainability Reporting Regulation or under the EU taxonomy. The other parts of this fund have underlying investments that do not follow the EU criteria for environmentally sustainable economic activities.

### **SFDR classification: Article 9**

**Applies to: Fondita Sustainable Europe**

The objective of Fondita Sustainable Europe is sustainable investment. This objective is primarily achieved through the fund's strategy of investing only in companies that enable, through their products or services, reduced CO2 emissions in accordance with SFDR article 9.3 and/or more efficient use of natural resources. These are the fund's two focus areas. In addition, the fund excludes all companies active within fossil energy sources. The emissions of the holding (scope 1 & 2) are monitored regularly, and the holdings must have a clear strategy to reduce emissions.

We also require the companies in which the fund invests to act responsibly in terms of their own environmental impact and social responsibility. The fund invests in companies that follow good governance practices.

All investments meet the requirements for sustainable investments set out in Article 2 of the SFDR Regulation and do not cause significant harm to any of the other environmental or social objectives.

Investment decisions take into account environmental and social issues and the risks associated with them. ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. They also refer to a company's vulnerability to the effects of climate change, depending on its geographical location and its overall business. As part of the ESG analysis of an investment object, the manager, together with the ESG team, identifies each investment object's sustainability risks, the likelihood of these risks materialising and the magnitude of the impact. All potential investment targets are subject to both an ESG analysis and a business analysis. We continuously assess the holders' sustainability risks, their likelihood and magnitude as part of our investment process. Any sustainability risks that materialise may have a negative impact on the holding and therefore the fund's returns. We continuously monitor these risks and, based on our assessment, this may have an impact on our investment decisions. We believe that one of the main sustainability risks that may affect the value of the fund's investments is related to environmental and climate issues. We manage these risks by excluding certain controversial sectors and conducting a thorough sustainability risk assessment of the sectors in which we invest.

Fondita applies a number of methods to ensure that all investments meet the requirements for sustainable investment under the SFDR Regulation. These are described in detail under the heading "Our method for responsible investing" on page 8. ESG analysis of the companies is carried out jointly by the ESG team and the fund manager. The fund does not have an official benchmark.

#### **Information on the EU taxonomy for environmentally sustainable activities**

The EU taxonomy is a classification system that aims to establish common criteria for environmentally sustainable economic activities.

The regulatory framework requires each fund to disclose the proportion of its investments that comply with the taxonomy. The taxonomy is under development and criteria for all environmental objectives are not yet complete. Furthermore, there is no established calculation model to assess the proportion of the fund's investments that comply with the taxonomy. The companies in which the fund invests have not yet started to report on the extent to which their activities comply with the EU taxonomy. Therefore, the Fund Management Company believes that it is currently not possible to provide reliable information on the proportion of the fund's investments that is compliant with the taxonomy.

## Fondita investment funds

Fondita currently manages eight equity funds. Our successful investment philosophy is based on stock picking and concentrated portfolios. In our investment process, we select companies with a strong market position and good future prospects. We are keen to see established profitability and a strong balance sheet. We also attach great importance to company management. Sustainability aspects are a central part of our investment process in all our funds.

**Table 1: Fondita investment funds**

Fund	Theme	Start date	Type of fund	SFDR Article	Other environmental certifications
Fondita European Micro Cap	European small caps	7 Mar 2017	UCITS	Article 8	
Fondita European Small Cap	European small and mid caps	19 May 2009	UCITS	Article 8	
Fondita Finland Micro Cap	Finnish small caps	7 Apr 1997	UCITS	Article 8	
Fondita Global Megatrends	Environment, demographics and technology	14 Sep 1998	UCITS	Article 8	Austrian Ecolabel
Fondita Healthcare	Healthcare	14 June 2018	UCITS	Article 8	
Fondita Nordic Micro Cap	Nordic small caps	29 Aug 2006	UCITS	Article 8	
Fondita Nordic Small Cap	Nordic small and mid caps	10 Sep 1997	UCITS	Article 8	
Fondita Sustainable Europe	Environment	19 May 2011	UCITS	Article 9	Nordic Swan Ecolabel <sup>1</sup> Austrian Ecolabel <sup>2</sup>

<sup>1</sup> Fondita Sustainable Europe, licence number 3101 0046. Read more at [svanen.se](https://svanen.se).

<sup>2</sup> Austrian Ecolabel UW 1367. Read more at [umwelzeichen.at](https://umwelzeichen.at).

## Fondita European Micro Cap

### Theme of the fund

Fondita European Micro Cap is an equity fund that invests in small quality companies in Europe with a market capitalisation of up to EUR 800 million. The fund invests in smaller niche companies with strong market positions and a clear focus on long-term growth and value creation for their owners. These companies are mainly found in sectors such as industrial technology, medical technology, information technology and consumer-related activities. Among Europe's smaller niche companies, we find a number of family-owned companies with good growth opportunities, healthy balance sheets and good profitability. Smaller companies also tend to be the subject of structured deals and acquisitions, providing an extra boost to returns. The fund started its activities on 7 March 2017.

### Target group

The fund is suitable for all long-term investors seeking exposure to Europe's smallest quality companies. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Kenneth Blomqvist and Janna Haahtela
Rules approved	19.9.2022
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2021)	0.45
Volatility (2021)	15,1%
Fees	See p. 22
Depository institution	SEB AB, Helsinki branch
Auditors	Anders Svernas, CPA Robert Söderlund, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's assets are efficiently diversified, which reduces investment risk. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies. General trends in European stock markets have an impact on the fund's performance. The turnover of small companies may be low. The liquidity risk that this may entail is sought to be reduced by investing part of the fund's assets in shares other than those of small companies.

### Fund investment policy

The fund is an equity fund mainly investing its assets in the shares of small listed companies in EU countries, Norway, the UK and Switzerland. Small companies are those with a market capitalisation of less than EUR 800 million. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita European Small Cap

### Theme of the fund

Fondita European Small Cap is an equity fund that invests in smaller European quality companies with a market capitalisation below EUR 4 billion. The fund invests in smaller niche companies with strong market positions. The fund has a wide sector distribution with investments in, for example, medical technology and consumer and industry-related activities. In these sectors, we find companies that can create value for their owners through good growth prospects. Small and medium-sized quality companies are also attractive targets for acquisition. The fund started its activities on 19 May 2009.

### Target group

The fund is suitable for all long-term investors seeking exposure to small and medium-sized quality companies in Europe. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Kenneth Blomqvist and Janna Haahtela
Rules approved	19.9.2022
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2021)	0.39
Volatility (2021)	15,6%
Fees	See p. 22
Depository institution	SEB AB, Helsinki branch
Auditors	Anders Svennas, CPA Robert Söderlund, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's assets are efficiently diversified, which reduces investment risk. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies. General trends in European stock markets have an impact on the fund's performance.

### Fund investment policy

The fund is an equity fund mainly investing its assets in the shares of small and medium-sized listed companies in EU countries, Norway, the UK and Switzerland. Small and medium-sized companies are those with a market capitalisation of less than EUR 4 billion. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Finland Micro Cap

### Theme of the fund

Fondita Finland Micro Cap is an equity fund that invests in smaller Finnish-listed companies with a market capitalisation of less than EUR 800 million. We aim to find smaller companies on the Finnish stock exchange that have good opportunities for profitable growth. Among these companies are a lot of new technologies and innovations that have the potential to become international success stories. Through Fondita Finland Micro Cap, we want to give our clients the opportunity to invest in a fund that focuses on promising Finnish companies that are still at a relatively early stage of their journey. The fund started its activities on 7 April 1997.

### Target group

The fund is suitable for all investors seeking exposure to listed Finnish small companies. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Marcus Björkstén and Markus Larsson
Rules approved	19.9.2022
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2021)	0.26
Volatility (2021)	13,4%
Fees	See p. 22
Depository institution	SEB AB, Helsinki branch
Auditors	Anders Svernas, CPA Robert Söderlund, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund is quoted in EUR and invests exclusively in the shares of euro-denominated companies. Since the fund invests its funds only in Finnish companies, there is a significant country risk. The turnover of small companies may be low. The liquidity risk that this may entail is sought to be reduced by investing part of the fund's assets in shares other than those of small companies.

### Fund investment policy

The name and investment policy of the fund was changed on 1 June 2022. The previous name of the fund was Fondita Equity Spice.

The fund is an equity fund investing in smaller Finnish-listed companies with a market capitalisation of less than EUR 800 million. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Global Megatrends

### Theme of the fund

Fondita Global Megatrends is a global equity fund that invests in companies which benefit from three megatrends. These are increased demand for climate- and environmentally smart solutions, demographic changes that primarily benefit companies in health and well-being, and the continuous digitalization and technological development throughout our society. Some of the drivers for the investment companies are global population growth, increased purchasing power and rising life expectancy, which increases the need for healthcare. Demand for food and energy is increasing, which also places greater demands on environmentally friendly and energy-efficient solutions. The fund started its activities on 14 September 1998. The name of the fund was changed on 19 September 2022. The previous name of the fund was Fondita 2000+.

### Target group

The fund is suitable for all investors looking for exposure to the three main themes of environment, demographics and information technology with a long-term investment perspective. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Janna Haahtela & Marcus Björkstén
Rules approved	19.9.2022
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2021)	0.14
Volatility (2021)	14,1%
Fees	See p. 22
Depository institution	SEB AB, Helsinki branch
Auditors	Anders Svernas, CPA Robert Söderlund, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's assets are efficiently diversified, which reduces the investment risk. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies.

### Fund investment policy

The fund is an equity fund, which invests its assets mainly in the shares of publicly listed domestic and foreign companies whose activities benefit from the growing demands of environmental protection and the fight against climate change, changing demographic structures and the growth prospects of the technology sector. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Healthcare

### Theme of the fund

Fondita Healthcare is a global equity fund that mainly invests in companies that promote health and well-being. The fund's focus is on innovative, quality companies with a good growth profile and they promote environmental and social characteristics and follow good governance practices. The fund's main holdings are in medical technology, Life Science companies and pharmaceuticals. The fund's growth drivers are the ageing population, increased welfare, and technological developments. The healthcare sector's low price elasticity is also a supporting factor for the fund's holdings. The fund started its activities on 14 June 2018.

### Target group

The fund is suitable for all long-term investors seeking exposure to growth companies in the healthcare sector in accordance with the fund's investment policy. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 5 years.

### Information about the fund

Managers	Janna Haahtela and Markus Larsson
Rules approved	19.9.2022
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2021)	0.15
Volatility (2021)	12,6%
Fees	See p. 22
Depository institution	SEB AB, Helsinki branch
Auditors	Anders Svennas, CPA Robert Söderlund, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's assets are efficiently diversified, which reduces investment risk. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies.

### Fund investment policy

Fondita Healthcare is an equity fund that invests in shares of publicly listed domestic and foreign companies whose activities promote health and well-being. The fund has a global mandate. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Nordic Micro Cap

### Theme of the fund

Fondita Nordic Micro Cap is an equity fund investing in small quality companies in the Nordic region with a market capitalisation of up to EUR 800 million with established operations. In these sectors, we find companies that can create value for their owners through good growth prospects. In the Nordic small companies market, we find interesting quality companies with both domestic and foreign operations. The companies are often specialists in niches with a strong market position, a strong balance sheet, good profitability and a strong owner behind them. We find interesting companies within the spectrum of manufacturing, technology, consumer-related business and medical technology. The fund started its activities on 29 August 2006.

### Target group

The fund is suitable for all long-term investors seeking exposure to the smallest quality companies in the Nordics in accordance with the fund's investment policy. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Markus Larsson and Kenneth Blomqvist
Rules approved	19.9.2022
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2021)	0.33
Volatility (2021)	16,7%
Fees	See p. 22
Depository institution	SEB AB, Helsinki branch
Auditors	Anders Svennas, CPA Robert Söderlund, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies. The fund's assets are efficiently diversified, which means that the impact of individual companies on the level of risk is low. General trends in Nordic stock markets have an impact on the fund's performance. The turnover of small companies may be low. The liquidity risk that this may entail is sought to be reduced by investing part of the fund's assets in shares other than those of small companies.

### Fund investment policy

Fondita Nordic Micro Cap is an equity fund that invests mainly in small, publicly-listed Danish, Finnish, Norwegian and Swedish companies' shares. Small companies are those with a market capitalisation of less than EUR 800 million. In order to ensure liquidity in the fund, part of the fund's assets may be invested in companies whose market capitalisation exceeds the threshold for small companies. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Nordic Small Cap

### Theme of the fund

Fondita Nordic Small Cap is an equity fund investing in quality companies in the Nordic region and with a market capitalisation of up to EUR 3 billion. In the Nordic market we find a number of interesting quality companies with local and global exposure. The companies are often market leaders in their niche, have good profitability, strong balance sheets and often have an influential owner behind them. The companies are active in a wide range of business activities. Everything from medical technology, manufacturing and software technology to consumer-related products and services. The fund started its activities on 10 September 1997.

### Target group

The fund is suitable for all long-term investors seeking exposure to smaller quality companies in the Nordics in accordance with the fund's investment policy. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Markus Larsson and Kenneth Blomqvist
Rules approved	19.9.2022
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2021)	0.23
Volatility (2021)	15,8%
Fees	See p. 22
Depository institution	SEB AB, Helsinki branch
Auditors	Anders Svennas, CPA Robert Söderlund, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies. The fund's assets are efficiently diversified, which means that the impact of individual companies on the level of risk is low. General trends in Nordic stock markets have an impact on the fund's performance.

### Fund investment policy

Fondita Nordic Small Cap is an equity fund that invests mainly in small and medium-sized publicly listed Danish, Finnish, Norwegian and Swedish companies' shares. Small and medium-sized companies are those with a market capitalisation of less than EUR 3 billion. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Sustainable Europe

### Theme of the fund

Fondita Sustainable Europe is an equity fund that invests mainly in European companies (EU countries, the UK, Norway and Switzerland) that through their services or products 1) facilitate a future with reduced CO<sub>2</sub> emissions and 2) facilitate a future in which natural resources are used in a more efficient way. The fight against climate change will play a central role in all types of businesses over the next 20 to 30 years. We are convinced that the companies that are seen as being part of the solution will perform better in relative terms. The fund started its activities on 19 May 2011.

### Target group

The fund is suitable for all investors who, like us, believe that sustainable companies will be the winners of the future. The Fund is also suitable for those looking for exposure to sustainable companies in Europe in accordance with the fund's investment policy. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Marcus Björkstén and Janna Haahtela
Rules approved	19.9.2022
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 9
Rate of turnover (2021)	0.53
Volatility (2021)	20,1%
Fees	See p. 22
Depository institution	SEB AB, Helsinki branch
Auditors	Anders Svernas, CGR Robert Söderlund, CGR
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital appreciation by diversifying the fund's assets in accordance with the Finnish law on investment funds and the fund's statutes.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's assets are efficiently diversified, which reduces the investment risk. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies. General trends in European stock markets have an impact on the fund's performance.

### Fund investment policy

The name and investment policy of the fund was changed on 19 May 2019. The previous name of the fund was Fondita European Top Picks.

Sustainable Europe is a sustainable investment fund that invests in listed companies in the EU, the UK, Norway and Switzerland whose activities contribute to sustainable development. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Additional information about the funds

The funds are managed by Fondita Fund Management Company Ltd, that carries out investment fund activities. The company is registered in the Finnish Trade Register. Marketing is primarily carried out by Fondita Fund Management Company Ltd. The Funds are not covered by the Investors' Compensation Fund nor the Deposit Guarantee Fund. The fund prospectus and other information are available free of charge from the Fund Management Company. The Fund Company and the investment funds are supervised by the Finnish Financial Supervisory Authority FIN-FSA, Snellmaninkatu 6, PL 159, 00101 Helsinki. Phone (09) 183 51, [finanssivalvonta@finanssivalvonta.fi](mailto:finanssivalvonta@finanssivalvonta.fi).

This prospectus and appendices of Fondita Fund Management Company Ltd. are not for release, publication nor distribution in or into the United States or any state, territory, or possession thereof, or any estate or trust which is subject to United States tax regulations. This material is not an offer to provide, or a solicitation of any offer to buy or sell, products or services in the United States of America.

## Price lists

Fund	Share class	Share class type	ISIN	Ongoing charges**,***	Redemption fee***	Registered for distribution	Transaction costs 2021	Risk category	Return 12 M (31.12.2021)	Minimum subscription
Fondita European Micro Cap	A*	distributing	FI4000242847	2,00 %	1,00 %	FI, SE, NO	0,12 %	6/7	37,8 %	-
Fondita European Micro Cap	B	accumulating	FI4000242854	2,00 %	1,00 %	FI, SE, NO	0,12 %	6/7	44,4 %	-
Fondita European Small Cap	A*	distributing	FI0008814686	2,00 %	1,00 %	FI, SE, NO	0,12 %	6/7	31,0 %	-
Fondita European Small Cap	B	accumulating	FI0008814694	2,00 %	1,00 %	FI, SE, NO	0,12 %	6/7	37,5 %	-
Fondita Finland Micro Cap	A*	distributing	FI0008802848	2,00 %	1,00 %	FI, SE, NO	0,07 %	6/7	19,5 %	-
Fondita Finland Micro Cap	B	accumulating	FI0008802855	2,00 %	1,00 %	FI, SE, NO	0,07 %	6/7	25,4 %	-
Fondita Global Megatrends	A*	distributing	FI0008802889	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,04 %	6/7	19,5 %	-
Fondita Global Megatrends	B	accumulating	FI0008802897	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,04 %	6/7	25,7 %	-
Fondita Global Megatrends	I	accumulating	FI4000411178	1,20 %	1,00 %	AT, DE	0,04 %	6/7	26,7 %	250 000
Fondita Healthcare	A*	distributing	FI4000321088	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,07 %	5/7	23,7 %	-
Fondita Healthcare	B	accumulating	FI4000321096	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,07 %	5/7	29,8 %	-
Fondita Healthcare	I	accumulating	FI4000411202	1,20 %	1,00 %	AT, DE	0,07 %	5/7	30,9 %	250 000
Fondita Nordic Micro Cap	A*	distributing	FI0008810932	2,00 %	1,00 %	AT, FI, SE, NO, DE, LU	0,09 %	6/7	23,8 %	-
Fondita Nordic Micro Cap	B	accumulating	FI0008810940	2,00 %	1,00 %	AT, FI, SE, NO, DE, LU	0,09 %	6/7	29,8 %	-
Fondita Nordic Micro Cap	I	accumulating	FI4000411186	1,20 %	1,00 %	AT, DE, LU	0,09 %	6/7	30,9 %	250 000
Fondita Nordic Small Cap	A*	distributing	FI0008802863	2,00 %	1,00 %	AT, FI, SE, NO, DE, LU	0,08 %	6/7	10,6 %	-
Fondita Nordic Small Cap	B	accumulating	FI0008802871	2,00 %	1,00 %	AT, FI, SE, NO, DE, LU	0,08 %	6/7	16,1 %	-
Fondita Nordic Small Cap	I	accumulating	FI4000411160	1,20 %	1,00 %	AT, DE, LU	0,08 %	6/7	17,0 %	250 000
Fondita Sustainable Europe	A*	distributing	FI4000024484	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,20 %	6/7	2,4 %	-
Fondita Sustainable Europe	B	accumulating	FI4000024492	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,20 %	6/7	7,5 %	-
Fondita Sustainable Europe	I	accumulating	FI4000411194	1,20 %	1,00 %	AT, DE	0,20 %	6/7	8,4 %	250 000

No subscription fee is charged by the fund management company. A front-end load of maximum 5,00 % may be applied at the time of purchase through a financial intermediary.

\*The A-units pay annual return (dividend) which is decided by the AGM (historically around 5 % of the fund unit value).

\*\* Custodian fee is included in the management fee.

\*\*\* Total client relationship allows for changes in tariff rate.

The formulas behind the calculations can be obtained at the Fund Management Company.

## Price list for customers in Finland

Fund	Share class	Share class type	ISIN	Ongoing charges <sup>***,***</sup>	Redemption fee <sup>****</sup>	Transaction costs 2021	Risk category	Return 12 M (31.12.2021)
Fondita European Micro Cap	A*	distributing	FI4000242847	2,00 %	1,00 %	0,12 %	6/7	37,8 %
Fondita European Micro Cap	B	accumulating	FI4000242854	2,00 %	1,00 %	0,12 %	6/7	44,4 %
Fondita European Small Cap	A*	distributing	FI0008814686	2,00 %	1,00 %	0,12 %	6/7	31,0 %
Fondita European Small Cap	B	accumulating	FI0008814694	2,00 %	1,00 %	0,12 %	6/7	37,5 %
Fondita Finland Micro Cap	A*	distributing	FI0008802848	2,00 %	1,00 %	0,07 %	6/7	19,5 %
Fondita Finland Micro Cap	B	accumulating	FI0008802855	2,00 %	1,00 %	0,07 %	6/7	25,4 %
Fondita Global Megatrends	A*	distributing	FI0008802889	2,00 %	1,00 %	0,04 %	6/7	19,5 %
Fondita Global Megatrends	B	accumulating	FI0008802897	2,00 %	1,00 %	0,04 %	6/7	25,7 %
Fondita Healthcare	A*	distributing	FI4000321088	2,00 %	1,00 %	0,07 %	5/7	23,7 %
Fondita Healthcare	B	accumulating	FI4000321096	2,00 %	1,00 %	0,07 %	5/7	29,8 %
Fondita Nordic Micro Cap	A*	distributing	FI0008810932	2,00 %	1,00 %	0,09 %	6/7	23,8 %
Fondita Nordic Micro Cap	B	accumulating	FI0008810940	2,00 %	1,00 %	0,09 %	6/7	29,8 %
Fondita Nordic Small Cap	A*	distributing	FI0008802863	2,00 %	1,00 %	0,08 %	6/7	10,6 %
Fondita Nordic Small Cap	B	accumulating	FI0008802871	2,00 %	1,00 %	0,08 %	6/7	16,1 %
Fondita Sustainable Europe	A*	distributing	FI4000024484	2,00 %	1,00 %	0,20 %	6/7	2,4 %
Fondita Sustainable Europe	B	accumulating	FI4000024492	2,00 %	1,00 %	0,20 %	6/7	7,5 %
Fondita Sustainable Europe	X**	accumulating	FI4000480363	1,00 %	0,00 %	0,20 %	6/7	

No subscription fee is charged. No minimum subscription.

\*The A-units pay annual return (dividend) which is decided by the AGM (historically around 5 % of the fund unit value).

\*\*Only available for Finnish distributors (under the scope of MiFID II) with whom Fondita has engaged an agreement.

\*\*\* Custodian fee is included in the management fee.

\*\*\*\* Total client relationship allow for changes in tariff rate regarding ongoing charges and redemption fee.

The formulas behind the calculations can be obtained at the Fund Management Company.

## Price list for customers in Sweden

Fund	Share class	Share class type	ISIN	Ongoing charges **,***	Redemption fee***	Transaction costs 2021	Risk category	Return 12 M (31.12.2021)
Fondita European Micro Cap	A*	distributing	FI4000242847	2,00 %	1,00 %	0,12 %	6/7	37,8 %
Fondita European Micro Cap	B	accumulating	FI4000242854	2,00 %	1,00 %	0,12 %	6/7	44,4 %
Fondita European Small Cap	A*	distributing	FI0008814686	2,00 %	1,00 %	0,07 %	6/7	31,0 %
Fondita European Small Cap	B	accumulating	FI0008814694	2,00 %	1,00 %	0,07 %	6/7	37,5 %
Fondita Finland Micro Cap	A*	distributing	FI0008802848	2,00 %	1,00 %	0,12 %	6/7	19,5 %
Fondita Finland Micro Cap	B	accumulating	FI0008802855	2,00 %	1,00 %	0,12 %	6/7	25,4 %
Fondita Global Megatrends	A*	distributing	FI0008802889	2,00 %	1,00 %	0,04 %	6/7	19,5 %
Fondita Global Megatrends	B	accumulating	FI0008802897	2,00 %	1,00 %	0,04 %	6/7	25,7 %
Fondita Healthcare	A*	distributing	FI4000321088	2,00 %	1,00 %	0,07 %	5/7	23,7 %
Fondita Healthcare	B	accumulating	FI4000321096	2,00 %	1,00 %	0,07 %	5/7	29,8 %
Fondita Nordic Micro Cap	SEK R	accumulating	SE0000347843	1,65 %	1,00 %	0,09 %	6/7	
Fondita Nordic Micro Cap	A*	distributing	FI0008810932	2,00 %	1,00 %	0,09 %	6/7	23,8 %
Fondita Nordic Micro Cap	B	accumulating	FI0008810940	2,00 %	1,00 %	0,09 %	6/7	29,8 %
Fondita Nordic Small Cap	A*	distributing	FI0008802863	2,00 %	1,00 %	0,08 %	6/7	10,6 %
Fondita Nordic Small Cap	B	accumulating	FI0008802871	2,00 %	1,00 %	0,08 %	6/7	16,1 %
Fondita Sustainable Europe	SEK R	accumulating	SE0000347843	1,50 %	1,00 %	0,20 %	6/7	
Fondita Sustainable Europe	A*	distributing	FI4000024484	2,00 %	1,00 %	0,20 %	6/7	2,40 %
Fondita Sustainable Europe	B	accumulating	FI4000024492	2,00 %	1,00 %	0,20 %	6/7	7,51 %

No subscription fee is charged. No minimum subscription.

\*The A-units pay annual return (dividend) which is decided by the AGM (historically around 5 % of the fund unit value).

\*\* Custodian fee is included in the management fee.

\*\*\* Total client relationship allow for changes in tariff rate regarding ongoing charges and redemption fee.

The formulas behind the calculations can be obtained at the Fund Management Company.

## Appendix 1. Additional Information for Investors in Germany

### Right to Distribution in Germany

The Fund Management Company has notified the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) of its intention to distribute Fund units in Fondita Investment Funds in Germany and may do so since completion of the notification process.

### Available Classes of Shares

The following classes of shares are available for all Fondita's funds registered for distribution in Germany

Class of Shares	A - retail EUR	B - retail EUR	I - Institutional EUR
Type	Distributing	Accumulating	Accumulating
Minimum Initial Subscription Amount	-	-	EUR 250 000**
Minimum subsequent investment	-	-	-
Ongoing charges	2,00 % p.a.*	2,00 % p.a.*	1,20 % p.a.*

\*Total client relationship allows for changes in tariff rate

\*\*Exemptions from the minimum initial investment can be made for distributors for justifiable reasons

With respect to the following Fondita Investment Funds no registration notification has been filed with BaFin and consequently Shares in the following Sub-fund must not be distributed in Germany:

- Fondita Finland Micro Cap
- Fondita European Small Cap
- Fondita European Micro Cap

### Paying and Information Agent in Germany

The function of paying and information agent in the Federal Republic of Germany has been assumed by:

Marcard, Stein & Co. AG  
Ballindamm 36  
20095 Hamburg

Redemption requests for Units can be submitted to the paying and information agent for forwarding to the Fund Management Company. Investors resident in Germany may request that all payments (redemption proceeds, any dividends and other payments) be forwarded to them via the paying and information agent. Investors resident in Germany shall, via the paying and information agent, have access to the same information and documentation made available to investors in Finland. The prospectus, key investor information, articles of association, and annual and semi-annual reports shall be available free of charge in hard copy from the paying and information agent. Issue, redemption, and conversion prices shall also be available free of charge from the paying and information agent.

### Publications

The issue and redemption prices are published on trading days in Germany on [www.fondita.com](http://www.fondita.com). Notices to investors are also published on this website.

In the cases listed in section § 298 sub-section 2 German Investment Code (KAGB) investors will also be informed by means of a "durable medium" within the meaning of section 167 KAGB. In addition, information may also be published in any other media which the Fund Management Company deems appropriate.

## Appendix 2. Additional Information for Investors in Austria

### Right to Distribution in Austria

The Fund Management Company has notified the Austrian Financial Market Authority (FMA) of its intention to distribute Fund units in Fondita Investment Funds in Austria and may do so since completion of the notification process.

### Available Classes of Shares

The following classes of shares are available for all Fondita's funds registered for distribution in Austria

Class of Shares	A - retail EUR	B - retail EUR	I - Institutional EUR
Type	Distributing	Accumulating	Accumulating
Minimum Initial Subscription Amount	-	-	EUR 250 000**
Minimum subsequent investment	-	-	-
Ongoing charges	2,00 % p.a.*	2,00 % p.a.*	1,20 % p.a.*

\*Total client relationship allows for changes in tariff rate

\*\*Exemptions from the minimum initial investment can be made for distributors for justifiable reasons

With respect to the following Fondita Investment Funds no registration notification has been filed with the Austrian Financial Market Authority (FMA) and consequently Shares in the following Fund must not be distributed in Austria:

- Fondita Finland Micro Cap
- Fondita Nordic Micro Cap
- Fondita European Small Cap
- Fondita European Micro Cap

### Facility in Austria

Facility in Austria according to EU directive 2019/1160 article 92 has been assumed by:

**Erste Bank der Oesterreichischen Sparkassen AG**

**Am Belvedere 1, A-1100 Wien, Austria**

**E-Mail: [foreignfunds0540@erstebank.at](mailto:foreignfunds0540@erstebank.at)**

Redemption requests for Units can be submitted to the facility for forwarding to the Fund Management Company. Investors resident in Austria may request that all payments (redemption proceeds, any dividends and other payments) be forwarded to them via the facility. Investors resident in Austria shall, via the facility, have access to the same information and documentation made available to investors in Finland. The prospectus, key investor information, articles of association, and annual and semi-annual reports shall be available free of charge in hard copy from the facility. Issue, redemption and conversion prices shall also be available free of charge from the facility.

### Publications

The issue and redemption prices are published on trading days in Austria on [www.fondita.com](http://www.fondita.com). Notices to investors are also published on this website. In addition, information may also be published in any other media which the Fund Management Company deems appropriate.

### Taxation

Fondita Fund Management Company Ltd. has appointed Erste Bank der oesterreichischen Sparkassen AG, Am Belvedere 1, 1100 Wien, Austria ([austriatax0991@erstebank.at](mailto:austriatax0991@erstebank.at)) as its tax representative in accordance with InvFG.

## Appendix 3. Additional Information for Investors in Luxembourg

### Addendum for Luxembourg investors

This document, dated March 17 2015, is a public document providing supplementary information and should be read in conjunction with the relevant fund's prospectus, Key Investor Information Document, and fund rules.

Fondita Nordic Micro Cap and Fondita Nordic Small Cap have been notified for public distribution in Luxembourg (excluding return-units). Fondita Fund Management Company Ltd. and its funds are subject to the supervision of the Finnish Financial Supervisory Authority (FIN-FSA).

For more information, please contact Fondita Fund Management Company Ltd. at [info@fondita.fi](mailto:info@fondita.fi) or visit our website [www.fondita.com/en](http://www.fondita.com/en).

### Paying agent in Luxembourg

Fondita Fund Management Company's paying agent in Luxembourg is:

Skandinaviska Enskilda Banken AB Luxembourg branch  
Office address: 4, Rue Peternelchen, L-2370 Howald, Luxembourg  
Mailing address: P.O. Box 487, L-2014 Luxembourg

### Subscriptions and redemptions

Investors may present subscription, redemption or conversion requests of units of the UCITS to Fondita

Fund Management Company Ltd.:

e-mail: [info@fondita.fi](mailto:info@fondita.fi)

FAX: +358 9 22 89 06 25

### Net Asset Value

Investors may obtain NAVs, issue and redemption prices from Fondita's website: [www.fondita.com](http://www.fondita.com).

### Documents and reports

The prospectus, the fund rules, and KIID, all in English, can be obtained from Fondita's website: [www.fondita.com](http://www.fondita.com).

Annual and semi-annual reports and, as far as enabled, an access to the contracts arranged with the UCITS are available in English upon request and free of charge by email from [info@fondita.fi](mailto:info@fondita.fi).

### Dividend payments

The fund share class (B-units) that has been notified for public distribution in Luxembourg does not pay dividends.

### Notices to unit holders

Notices to unit holders will primarily and when possible be given directly to the unit-holder, in other cases notices to the unit holders will be published in the "Luxemburger Wort".

## Rules for Fondita Investment Funds

(This is an unofficial translation of the official rules in Finnish)

### FONDITA FUND SPECIFIC RULES

#### FONDITA EUROPEAN MICRO CAP INVESTMENT FUND

##### 1§ NAME OF THE FUND

The name of the fund is Fondita European Micro Cap Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita European Micro Cap Sijoitusrahasto and in Swedish Fondita European Micro Cap Placeringsfond.

##### 5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in stocks of small-sized European companies. The company size is measured according to the company's trading value. The board of the Fund Company will establish the upper limit for the trading value of small-sized companies. The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

#### 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in EU countries, Switzerland, Norway and Great Britain open to the public. The investments are mostly made outside the Nordic countries.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

#### FONDITA EUROPEAN SMALL CAP INVESTMENT FUND

##### 1§ NAME OF THE FUND

The name of the fund is Fondita European Small Cap Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita European Small Cap Sijoitusrahasto and in Swedish Fondita European Small Cap Placeringsfond.

##### 5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in stocks of small and medium - sized European companies. The company size is measured according to the company's trading value. The board of the Fund Company will establish the upper limit for the trading value of small and medium -sized companies. The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

#### 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in EU countries, Switzerland, Norway and Great Britain open to the public. The investments are mostly made outside the Nordic countries.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

### **FONDITA FINLAND MICRO CAP INVESTMENT FUND**

#### 1§ NAME OF THE FUND

The name of the fund is Fondita Finland Micro Cap Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Finland Micro Cap Sijoitusrahasto and in Swedish Fondita Finland Micro Cap Placeringsfond.

#### 5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are invested primarily in securities that of small-sized Finnish companies. The board of the Fund Company will establish the upper limit for the trading value of small-sized companies.

The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

#### 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in Finland open to the public.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

### FONDITA GLOBAL MEGATRENDS INVESTMENT FUND

#### 1§ NAME OF THE FUND

The name of the fund is Fondita Global Megatrends Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Global Megatrends Sijoitusrahasto and in Swedish Fondita Global Megatrends Placeringsfond.

#### 5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in securities of such companies that through their activities promote the growing demands of environmental protection and the changing population structure, as well as the growth prospects of the technology sector.

The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

#### 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets globally that are open to the public.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

## **FONDITA HEALTHCARE INVESTMENT FUND**

### **1§ NAME OF THE FUND**

The name of the fund is Fondita Healthcare Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Healthcare Sijoitusrahasto and in Swedish Fondita Healthcare Placeringsfond.

### **5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES**

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of

investment activity risks. The means of the Fund are primarily invested in securities of such companies that through their activities enhance health and wellbeing.

The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

## **6§ INVESTMENT OF THE ASSETS OF THE FUND**

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets globally that are open to the public.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus

amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

## **FONDITA NORDIC MICRO CAP INVESTMENT FUND**

### **1§ NAME OF THE FUND**

The name of the fund is Fondita Nordic Micro Cap Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Nordic Micro Cap Sijoitusrahasto and in Swedish Fondita Nordic Micro Cap Placeringsfond.

### **5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES**

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in stocks of small sized Nordic companies. The company size is measured according to the company's trading value. The board of the Fund Company will establish the upper limit for the trading value of small-sized companies. The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment

activities are available in the fund prospectus that is in force at that particular point of time.

### **6§ INVESTMENT OF THE ASSETS OF THE FUND**

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in the Nordic countries open to the public.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

## **FONDITA NORDIC SMALL CAP INVESTMENT FUND**

### **1§ NAME OF THE FUND**

The name of the fund is Fondita Nordic Small Cap Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Nordic Small Cap Sijoitusrahasto and in Swedish Fondita Nordic Small Cap Placeringsfond.

### **5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES**

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in stocks of small and medium - sized Nordic companies. The company size is measured according to the company's trading value. The board of the Fund Company will establish the upper limit for the trading value of small and medium -sized companies. The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

#### 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

- 1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in the Nordic countries open to the public.
- 2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.
- 3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

### **FONDITA SUSTAINABLE EUROPE INVESTMENT FUND**

#### 1§ NAME OF THE FUND

The name of the fund is Fondita Sustainable Europe Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Sustainable Europe Sijoitusrahasto and in Swedish Fondita Sustainable Europe Placeringsfond.

#### 5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks.

The aim of the Fund is sustainable investment in accordance with Article 9 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management. The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

## 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in EU countries, Switzerland, Norway and Great Britain open to the public.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

## COMMON RULES FOR ALL FONDITA FUNDS

### 2§ FUND COMPANY

Investment activities and administration of the fund are managed by Fondita Fund Management Ltd (hereinafter referred to as the Fund Company). The Fund Company shall represent the Fund, shall act on

its behalf in relevant matters and shall exercise the rights accorded to the assets in the Fund.

### 3§ THE USE OF REPRESENTATIVES

The Fund Company may delegate its activities to representatives. The fund prospectus will notify as to which parts the Fund Company will engage representatives.

### 4§ CUSTODIAN

The custodian of the Fund is Skandinaviska Enskilda Banken AB (publ), Helsinki branch. (hereinafter referred to as the Custodian).

### 7§ FUND UNITS AND REGISTER

The Fund Company shall maintain a register of all fund units and shall register transfers of ownership.

A fund unit-holder may request the Fund Company to send an investment certificate to a designated person. The investment certificate may cover several fund units or fractions thereof. The Fund Company may charge a separate service tariff for the safekeeping and delivery of a written investment certificate. The service tariff is given in the fund prospectus that is in force at that particular point of time. If no request is made for an investment certificate, the unit-holder's holdings shall be based on the register of fund units maintained by the Fund Company. The numbers of fund units are calculated at least to the nearest four (4) decimals.

The board of the Fund Company may decide that the Fund is made up of both return units and growth units. The board of the Fund Company may decide that there are fund unit classes that differ in terms of management fee or denomination currency. The board of the Fund Company decides on the minimum subscription amount or other prerequisites such as client classification required for of subscription in each unit class and these are stated in the relevant fund prospectus and KIIDs. The Board of Directors of the Management Company may provide more detailed instructions on how fund units are subscribed from outside of Finland, or by using a currency other than that used in Finland at any given time.

### 8§ SUBSCRIPTION AND REDEMPTION OF FUND UNITS

Fund units may be subscribed to (bought) and redeemed (sold) at the Fund Company on the Funds opening days as stated in the §10 of the Fund rules (hereinafter "Valuation Day"). Information regarding subscription and redemption prices are available to the public from the Fund Company on every banking day. The subscription date is the Valuation Day on which the subscription sum is cleared into the appropriate Fund Company bank account by 2.30 p.m. (Finnish time). The Fund Company can make an exception to the 2.30 p.m. (Finnish time) rule only if the Fund Company can assure that the subscription amount will be received within the time limit that is considered as market practice (T+2). This exception can only be made with substantial reasons and it requires a separate approval given by the management of the Fund Company. The subscription price (fund unit value) is the value calculated for the Valuation Day. The fund unit value is published on the banking day following the Valuation Day.

Subscription sums cleared to the Fund Company after 2.30 p.m. (Finnish time) shall be subscribed on the next Valuation Day.

The Fund Company reserves the right to approve or reject subscriptions, redemptions and other Fund orders if sufficient information for the order has not been obtained.

The number of subscribed fund units is calculated at the Fund Company at least to the fourth decimal point by dividing the subscription payment (from which any subscription fees have been deducted) by the unit value.

In order to redeem fund units, any investment certificate must duly be submitted to the headquarters of the Fund Company.

Redemption orders shall be executed in the order received. The redemption price (fund unit value) is the fund value calculated for the fund unit for the Valuation Day, given that the redemption orders have been received by 2.30 p.m. (Finnish time). Redemption orders received after 2.30 p.m. (Finnish time) shall be executed at the value of the next Valuation Day. The funds provided by the redemption minus any redemption fees is credited to the client normally on the banking day following the Valuation Day, if the Fund Company does not have to sell securities in order to be able to carry out the redemption order.

If the resources required for redemption must be procured by selling securities, the Fund Company shall execute the sale of securities without undue delay, however at the latest within two (2) weeks of the request for redemption. In such a case, redemption is executed at the rate on the Valuation Day on which the redemption order was received by 2.30 p.m. (Finnish time) by the Fund Company. The redemption price shall be paid at the latest on the banking day following the day on which the funds from the sale of securities have been received. The Finnish Financial Supervision authority may, for special reasons, grant the right to transcend the abovementioned period.

The Fund Company may decide to limit redemptions if the total of all received redemption assignments exceed 10% of the Fund's assets. The Fund Company may move the exceeding portion of the redemptions to the following redemption date or, if necessary, to several subsequent redemption dates if the total of all received redemption assignments exceed 10% of the Fund's assets. The Fund Company may decide on restrictions even after the redemption assignments have been submitted to the Fund Company.

Under exceptional circumstances, if a fund unit-holder's interest so requires, the Fund Company may interrupt the execution of fund unit orders (for example, when reliable market information is not obtainable from the Fund's primary market or its integral parts).

The board of the Fund Company may decide how many units or for what sum units may be bought or sold at one time.

Fund unit-holders have the right to swap all or part of their fund units to the other investment funds managed by the Fund Company. Fund unit-holders may also swap between unit classes within the Fund. Fund units may be transferred. The ownership is registered in the fund unit-holder register after reliable documentation of the transfer has been provided.

When a fund unit-holder swaps fund units in other funds managed by the Fund Company and that at the same time are offered for subscription, the Valuation Day that the order of the fund swapping was received and approved at the latest at 2.30 p.m. (Finnish time) by the Fund Company will be regarded as the

redemption and subscription day, providing the Fund has the cash means needed for the fund exchange.

#### 9§ SUBSCRIPTION AND REDEMPTION PRICE OF FUND UNITS

The Fund Company may charge a maximum 1% fee for redemption of fund units.

If an external distributor is responsible for the distribution of fund units, a commission may be charged on subscription. The maximum commission is five (5) per cent of the subscription amount.

The above commissions are maximum commissions.

More detailed information about the fees for the different fund unit classes is found in the fund prospectus in force at that particular time.

The board of the Fund Company may decide to charge unit-holders a fee for the printing and delivery of paper investment certificates as well as for their safekeeping at the Fund Company.

#### 10§ CALCULATION OF THE FUND UNIT VALUE

It is possible not to calculate the NAV on Business Days when the value of the Fund or its investment vehicles cannot be determined precisely

due to bank holidays or other public holidays abroad. Such public holidays may include religious holidays, National Days or other national holidays. The above may be the case at least when a minimum of half of the Fund's investment vehicles are not quoted or they cannot be, in the Fund Management Company's view, valued in an acceptable way in view of the equality of unitholders. Information on the days when the

Fund's value is not calculated is available from the Fund Management Company. Information about the fund unit value is also available from the Fund Company.

The value of the fund is calculated so that the liabilities of the Fund are deducted from its assets. The value of the Fund's securities shall be established on the basis of their market value, which is the official closing price at the closing of the market in a public price tracking system

If an above-mentioned price is not available for the Valuation Day, the value is determined in accordance with the objective principles of the Fund Company. The interest of the accounts receivable affects the

value of the Fund and is considered in accordance with the bank statement. The value of holdings in the Fund in currency amount is converted into euros according to the exchange rate published by the European Central Bank on the Valuation Day. Units in the Fund may be issued in currencies other than euro. If units in the Fund have been issued in currencies other than euro, the net asset value of the fund units denominated in foreign currencies will be calculated at the same exchange rates as the Fund's net asset value.

The value of a fund unit is calculated by dividing the value of the Fund with the number of shares issued, noting however, that the value of the return units reflects yield paid to those units. The proportional values of the return and growth units are determined by the return allocated to the owners of return units. The allocation payment changes the accounting number between the return and growth units. This accounting number is used for the following decision in case there is a lack of allocation of return.

#### 11§ ALLOCATION OF RETURN

The Ordinary General Meeting shall decide the return to be allocated and paid to holders of return units. The aim is to keep the return on a stable and predictable level. Return paid out to return unit-holders shall be deducted from the calculated fund capital for return unit-holders. Return is not paid out to growth unit-holders, rather their share of the return is added to the value of the units and reinvested in accordance with the investment strategy of the Fund.

Return is paid out to holders of return units who are registered in the Fund Company's unit register on the date of the Ordinary General Meeting. The payment will take place at the latest one (1) month after the General Meeting. After notice of the meeting, the unit holders can obtain information about the date of the General Meeting from the Fund Company during its opening hours. The return is paid to the bank account designated by the unit-holder, unless otherwise decided.

#### 12§ PAYMENT TO THE FUND COMPANY

In remuneration for its activities, the Fund Company will receive a management fee amounting to a maximum of two (2) percent per annum of the value of the fund. The sum of the fee shall be calculated

daily (per annum percentage fee /365) on the fund value on the previous calculation date and shall be paid to the Fund Company monthly in arrears. The daily fund unit value reflects the deducted management fee. The board of the Fund Company shall confirm the exact management fee. Custodian fee is included in the management fee.

More detailed information about the fees for the different fund unit classes is found in the fund prospects in force at the respective point in time.

#### 13§ ACCOUNTING PERIOD OF THE FUND COMPANY AND FUND

The accounting period of the Fund Company and the Fund shall be one calendar year.

#### 14§ MEETING OF FUND UNIT-HOLDERS

The Fund Company does not convene for ordinary General Meetings of fund unit-holder. An Extraordinary meeting of the fund unit-holders shall be held when considered justified by the board of the Fund Company, or if the auditors or holders of fund units amounting to at least one twentieth of all the fund units issued request this in writing in order to deal with a specific matter.

The General Meeting shall be convened by the board of the Fund Company. Notice of the meeting must be conveyed to the fund unit-holders at the earliest four weeks prior and at the latest two weeks prior to the meeting. This shall be done by way of an announcement which shall be published in at least one national newspaper appearing in Finland. Other announcements to fund unit-holders shall be notified in verifiable form either in writing or as an announcement to be published in at least one national newspaper published in Finland.

In order to attend the Ordinary General Meeting, the fund unit-holder must sign up to do so with the Fund Company at the latest on the date specified on the notice. A fund unit-holder is not allowed to exercise the right which at the meeting belongs to the unit holder before his fund units have been registered or he has given an account of his title to the Fund Company and presented a report thereof. The right to participate in the meeting of fund unit-holders and the number of votes at the meeting will be determined on the basis of the situation prevailing ten days prior to the meeting.

#### 15§ FUND PROSPECTUS

The fund prospectus of the Fund, the KIID, the interim report and the annual reports of the Fund Company will be published in compliance with the law concerning investment funds. The biannual interim report must be issued within two months of the end of the interim reporting period and the Fund's annual report within three months of the end of the accounting period. The above mentioned documents are available at the Fund Company during its opening hours.

#### 16§ AMENDING THE FUND'S BYLAWS

The board of the Fund Company shall decide on any amendment to the bylaws of the Fund. Amendments must be ratified by the Finnish Financial Supervision Authority.

Amendments to the bylaws shall come into effect one month after the Finnish Financial Supervision Authority has given its confirmation and the fund unit-holders have been informed of the amendment, unless otherwise instructed by the Finnish Financial Supervision Authority. A written notice sent by post shall be regarded as having come to the knowledge of the unit-holder on the fifth (5th) day after having been posted or on the day that the notice has been published in a national newspaper appearing in Finland. After coming into effect, amendments to the bylaws shall apply to all unit-holders.

#### 17§ SUPPLYING INFORMATION

The Fund Company has the right to supply information on the unit-holders in compliance with the legislation in force at the respective period of time.

#### 18§ REMUNERATION

Fund Company staff who fall under the scope of the remuneration policy of the Fund Company according to the Finnish Act on Common Funds, shall to the variable part be paid in fund units of the relevant UCITS fund to a minimum of 50 per cent of this variable payment must be paid in fund units.